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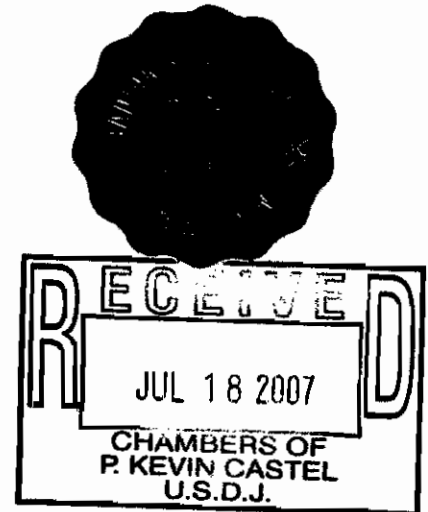
ROMAN BADIAK
ALFRED J. WILL
JAMES P. KRAUZLIS
LISA ANN SCOGNAMILLO

MEMO ENDORSED

July 17, 2007

USDS SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 7/20/07
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Honorable P. Kevin Castel
United States Courthouse, Suite 2260
500 Pearl Street
New York, New York 10007



RE: Federal Insurance Company v. Expeditors, et al.
07 CV 3166 (PKC)
Our Ref.: 07-T-002-RB

Honorable Sir:

We represent defendant Expeditors International et al on the above captioned matter. This is a subrogation action filed by Federal Insurance Company regarding numerous, unrelated shipments by vessel, air and railroad. We filed an answer to the complaint on May 14, 2007. On June 12, 2007, eight (8) days beyond the 20 days allowed for filing of a third-party complaint, we filed third-party complaints against vessel owners, the railroad and air carriers on these various shipments. Since we were eight (8) days late, due to the lateness in obtaining documents showing who all of the third-parties are, we filed this matter with the Clerk of the Court which was then delivered to Your Honor for permission to file. Unfortunately, Your Honor did not grant leave to file the third-party complaints.

We herewith attach the third-party complaints originally filed on May 14, 2007 with our request for your kind patience and cooperation and granting leave to file and serve the complaints.

Due to the small amounts involved in this litigation, once the third-party defendants are in this action, it will probably settle very quickly with contributions from all parties.

We thank Your Honor for your kind patience and cooperation.

Respectfully submitted,

BADIAK & WILL, LLP


ROMAN BADIAK

RB/lmw

Enc.

cc: Law Offices of
David L. Mazaroli, Esq.
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New York, New York 10007
(w/o enc.)

*Leave to serve
and file third party
complaints
granted. Conference
adjourned for
July 20 to
September 7, 2007 at 12:45 PM*

SO ORDERED.
[Signature]
USDS
7-19-07